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April 15, 2022

VIA ECF

The Honorable Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Elliott v. Donegan, et al.*, No. 1:18-cv-05680-LDH-SJB

Dear Judge Bulsara:

Pursuant to the Court's Order of April 1, 2022, I write on behalf of Plaintiff Stephen Elliott and Defendant Moira Donegan to submit a joint proposal for the completion of discovery.

Recognizing that the parties have not yet engaged in merits discovery in this litigation—and have instead confined discovery thus far to Ms. Donegan's affirmative defense under the Communications Decency Act—the parties respectfully propose the following schedule:

- May 13, 2022: Deadline for parties to serve initial merits discovery requests
- October 14, 2022: Deadline for substantial completion of all document discovery
- November 16, 2022: Deadline for parties to serve final written discovery requests (e.g., interrogatories and requests for admission)
- December 16, 2022: Deadline for completion of all fact discovery
- February 3, 2023: Deadline for parties to serve expert reports
- March 17, 2023: Deadline for parties to serve rebuttal expert reports
- April 14, 2023: Deadline for completion of all discovery in the case (including expert depositions)

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By May 13, 2022, the parties will agree on an ESI protocol for all remaining discovery.

Respectfully submitted,



Joshua Matz